

MARTIN D. HAVERLY
ATTORNEY AT LAW
Two East 7th Street
Suite 201
Wilmington, Delaware 19801

Licensed in Delaware
and Pennsylvania

Telephone
(302)654-2255
Facsimile
(302)654-0175

October 4, 2007

Via E-Filing

The Honorable Mary Pat Thyng
United State District Court
844 North King Street
Wilmington, DE 19801

RE: Benjamin E. Jackson, Sr. v Ursuline Academy
C.A. No. 07-71-MPT
Plaintiff's Interim Status Report

Dear Judge Thyng:

The parties have exchanged Initial Disclosures and Plaintiff has served a First Set of Interrogatories and First Request Production on Defendant. Defendant sent Requests for Production to Plaintiff yesterday. A Mediation is scheduled with Your Honor on Tuesday, October 16, 2007.

Unfortunately, to date Defendant has not provided Answers and Responses to the outstanding discovery served by Plaintiff, and the Defendant's Initial Disclosures were only provided in September 2007 and do not identify the topics which can be provided by the witnesses identified by Defendant. Depositions will be scheduled after Plaintiff receives the outstanding discovery. After speaking with opposing counsel, I am confident that the outstanding discovery and more precise Initial Disclosures will be provided to Plaintiff shortly.

I do not anticipate there will be a difficulty concerning the scheduling of depositions because the universe of witnesses is less than typical for an employment discrimination case.

However, the expert reports will need to be pushed off because Plaintiff has not yet received from Defendant documents concerning economic loss. I suggest that the new date for

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expert reports be Wednesday, November 14, 2007 with rebuttal reports due on December 14, 2007. Any mop up expert depositions could take place thereafter.

Respectfully submitted,

/s/Martin D. Haverly

Martin D. Haverly

MDH/acs

cc: Vincent A. Bifferato, Jr., Esquire (via e-filing)
The Neuberger Firm
Benjamin E. Jackson, Sr.